

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:	:	
	:	CHAPTER 11
EROSOL, LLC	:	
	:	CASE NO. 16-57405-MGD
DEBTOR.	:	
	:	

**ACTING UNITED STATES TRUSTEE'S APPLICATION FOR
APPROVAL OF SELECTION OF APPOINTMENT OF CHAPTER 11 TRUSTEE**

The Acting United States Trustee for Region 21 (the “Applicant”) hereby applies to the Court pursuant to Fed. R. Bankr. P. 2007.1 for an Order Approving Appointment of Chapter 11 Trustee, and in support thereof, states as follows:

1. On June 24, 2016, Applicant appointed S. Gregory Hays as Chapter 11 Trustee in the above-captioned case.
2. Counsel for Applicant consulted with the following parties-in-interest regarding the appointment of the Trustee:
 - a. Debtor – Erosol, LLC
 - b. Debtor’s current lessor - Crushpad Properties, LLC
 - c. Debtor’s secured creditor -Swift Financial Corp.
3. To the best of the Applicant’s knowledge, the Chapter 11 Trustee’s connections with the debtor, creditors, any other parties-in-interest, their respective attorneys and accountants, the United States Trustee, and persons employed in the Office of the United States Trustee, are limited to the connections set forth in the Verified Statement filed in support of this Application.

WHEREFORE, Applicant requests that the Court enter an Order Approving Appointment of S. Gregory Hays as Chapter 11 Trustee in the above-captioned case.

Date: June 24, 2016

RESPECTFULLY SUBMITTED

GUY G. GEBHARDT
ACTING UNITED STATES TRUSTEE
REGION 21

By: /s/ Vivieon E. Kelley
Vivieon E. Kelley, Esquire
Georgia Bar No. 143033
United States Department of Justice
Office of the United States Trustee
Suite 362, Richard B. Russell Building
75 Spring Street, SW
Atlanta, Georgia 30303
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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
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IN RE: :
EROSOL, LLC : CHAPTER 11
DEBTOR. : CASE NO. 16-57405-MGD
: :

VERIFIED STATEMENT OF S. GREGORY HAYS

I, S. Gregory Hays, do hereby certify under penalty of perjury that the following information is true and correct to the best of my knowledge, information, and belief:

1. I am a resident of the State of Georgia. My business address is:

Hays Financial Consulting, LLC
Suite 200
3343 Peachtree Road, NE
Atlanta, GA 30326-1420
(404) 926-0060

2. I have no connections with the Debtor, creditors, any other parties in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee, except as follows: (**If you have no connections, write "None."**)

3. To the best of my knowledge, information, and belief, I do not hold or represent any interest adverse (i) to the estate of the Debtor; or (ii) to any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor, or for any other reason.

4. I will promptly advise the Bankruptcy Court and the Office of the United States Trustee of any circumstances that cause the foregoing to change.

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct.

Date: July 21, 2016.



S. GREGORY HAYS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent by First Class United States Mail to the following parties in interest:

Erosol, LLC
1410 Eastland Road
Atlanta, GA 30316

Leonard R. Medley, III
Medley & Associates, LLC
Suite 1450
2727 Paces Ferry Road
Atlanta, GA 30339

Brooke E. Heinz
The Office of the Attorney General
40 Capitol Square
Atlanta, GA 30334-1300

James W. Hays
Hays Potter & Martin, LLP
3945 Holcomb Bridge Road, Suite 300
Peachtree Corners, GA 30092

Done this 24th day of June 2016.

/s/ Vivieon E. Kelley